

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA**

IN RE:)	
GAYLON JAY TOLES)	CASE NO. 09-13747-NLJ
)	
Debtor(s).)	Chapter 13

**OBJECTION TO TRUSTEE’S MOTION TO DISMISS FOR FAILURE TO MAKE
REGULAR PAYMENTS AND APPLICATION FOR ATTORNEY COMPENSATION**

COMES NOW, Gaylon Jay Toles, (hereinafter referred to as “Debtor”) by and through her attorney of record, Dekovan L. Bowler of the Law Firm of Bowler & Associates P.C., and hereby objects to the Chapter 13 Trustee’s Motion to Dismiss for Failure to Make Regular Payments filed herein on July 15, 2013. In support of said objection the Debtor would state as follows:

1. Debtor filed for relief under the provisions of Chapter 13 Bankruptcy on July 13, 2009.
2. Debtor’s Chapter 13 plan was confirmed on September 14, 2009.
3. Debtor is currently behind on her Chapter 13 plan payments due to a loss of income.
4. Debtor proposes to cure the missed payments by increasing the term of her plan payments over the next six (6) months. In addition, the Debtor would request that her attorney be awarded \$350.00 for his fees and costs in resolving this matter.
5. Debtor further proposes that if the regular or cure payments over the next six (6) months are not made by the last business day of each month the Chapter 13 Trustee may present an order, ex parte dismissing this case with no further notice.

WHEREFORE premises considered, Debtor prays that this Court deny the Chapter 13 Trustee’s Motion to Dismiss and issue an Order allowing the Debtor to cure the missed Chapter 13

plan payments over the next six (6) months and for any further relief the Debtor may be entitled to according to bankruptcy law.

Respectfully Submitted,

/s/ Dekovan L. Bowler

Dekovan L. Bowler, OBA #15193

BOWLER & ASSOCIATES P.C.

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ATTORNEY FOR THE DEBTOR

CERTIFICATE OF MAILING

This is to certify that on the 16th day of July, 2013, a true and correct copy of the above and foregoing Objection to Trustee's Motion to Dismiss for Failure to Make Payments was mailed to: John T. Hardeman, Chapter 13 Trustee, P.O. Box 1948, Oklahoma City, OK 73101.

/s/ Dekovan L Bowler

Dekovan L. Bowler